

**UNITED STATES DISTRICT COURT
DISTRICT OF VERMONT**

**Donna Browe, the Estate of Beverly
Burgess, Tyler Burgess,
Bonnie Jamieson, Philip Jordan,
and Lucille Launderville**

**SECOND AMENDED
COMPLAINT**

Plaintiffs,

Civil Action No. 2:15-cv-00267-cr

-against-

**CTC Corporation; and
Bruce Laumeister**

Defendants.

PLAINTIFF LUCILLE LAUNDERVILLE'S ANSWER TO DEFENDANTS' COUNTERCLAIM

Plaintiff Lucille Launderville files this Answer to Defendants' Counterclaim, contained in Defendants' Amendment to Defendants' Answer to Second Amended Complaint (Doc. 135)¹, and answers the numbered paragraphs of said Counterclaim as follows:

1. Denied.

1. Plaintiffs have filed, contemporaneously herewith, Plaintiffs' Motion to Strike Defendants' Amendment to Defendants' Answer to Second Amended Complaint and Defendants' Answer to Second Amended Complaint. The foregoing Motion to Strike asserts that the amended pleadings described in said Motion (including Doc. 135) were filed by Defendants without authorization from the Court and without any other legal basis to allow their filing. This Answer is filed to serve as a response to Defendants' Counterclaim only in the event that the Court denies the foregoing Motion to Strike and permits Defendants' Counterclaim to stand as filed.

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2. Denied.

3. Denied.

4. Denied.

5. Denied.

6. Denied.

7. Denied.

8. Denied.

9. Denied.

10. Denied.

11. Denied.

12. This paragraph in Defendants' counterclaim restates answers and affirmative defenses to Plaintiffs' allegations. No response is required to said answers and affirmative defenses. Otherwise, denied.

13. This paragraph consists of legal arguments, to which no response is required. Otherwise, denied.

14. This paragraph states a legal conclusion, to which no response is required. Otherwise, denied.

15. Denied.

16. Denied.

17. Denied.

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18. Denied.

19. Denied.

20. Denied.

21. Denied.

22. Denied.

23. Denied.

24. Denied.

25. Denied.

26. Denied.

27. Denied.

28. Denied.

29. Denied.

30. Denied.

31. Denied.

32. Plaintiffs' Second Amended Complaint is a document which speaks for itself. Otherwise, denied.

33. Denied.

34. Denied.

35. Denied.

36. This paragraph contains a legal argument to which no response is

required. Otherwise, denied.

37. This paragraph contains a legal argument to which no response is required. Otherwise, denied.

WHEREFORE, Plaintiff Lucille Launderville prays that the Court deny Defendants' Counterclaim and all relief requested therein, enter judgment against Defendants awarding attorneys' fees, costs, and other relief to Plaintiffs as the Court deems just and equitable, and that Defendants take nothing in this action.

Dated: August 22, 2017

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